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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
GOOGLE LLC'S ADMINISTRATIVE
MOTION FOR CLARIFICATION OF
MAY 20, 2022 PRESERVATION ORDER
(DKT. 587)**

Judge: Hon. Susan van Keulen

1 Google LLC seeks an order clarifying the Court’s May 20, 2022 Order Adopting in Part and
2 Modifying in Part the Special Master’s Report and Recommendation on Referred Discovery Issues
3 re Preservation Plan (Dkt. 587) (“Preservation Order”). Having considered the arguments of the
4 parties and the papers submitted, Google’s Motion for Clarification is GRANTED.

5 Pursuant to the May 20, 2022 Preservation Order:

6 1. Google is required to seek express permission of this Court before it limits the
7 retention period of any data source included in the Preservation Order. Google is not required to
8 seek permission of this Court to limit the retention period of any data source not included in the
9 Preservation Order.

10 2. Google is required to preserve encryption keys to the extent they are necessary for
11 data preserved under the Preservation Order to be decrypted. If Google preserves data in a processed
12 and secure format that can be read without sensitive rotating encryption keys, then Google is not
13 required to preserve sensitive rotating encryption keys.

14
15 **IT IS SO ORDERED.**

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18 DATED: _____

19 THE HONORABLE SUSAN VAN KEULEN
20 United States Magistrate Judge
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